

CS 98-120



Colorado Broadcasters Association

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SEP - 7 2007  
Federal Communications Commission  
Office of the Secretary

September 6, 2007

The Honorable Kevin J. Martin  
445 12th Street, SW  
Washington, D.C. 20554

202-418-2801 FAX

RE: CableTV Viewability Proposal

Dear Chairman Martin,

On behalf of the Colorado Broadcasters Association, I would like to voice our support of the Cable TV Viewability Proposal. I hope that the FCC will be sensitive to the needs of American consumers when considering this cable carriage issue. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition on February 17, 2009.

We also feel that TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Marilyn C. Hogan  
President and CEONo. of Copies rec'd 0  
List A B C D E

SEP - 7 2007

Federal Communications Commission  
Office of the Secretary**From:** Eileen Clark [mailto:eileen@shbvtv.com]**Sent:** Friday, September 07, 2007 10:35 AM**To:** Kevin Martin**Cc:** Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell; mmacbride@nab.org; cwilkins@nab.org; 'Louis Wall'**Subject:** Cable TV Viewability Proposal

Honorable Chairman Martin & Commissioners:

SagamoreHill Broadcasting supports the adoption of the CableTV Viewability Proposal on September 11, 2007. We strongly believe that adoption of this proposal will protect analog subscribers from loss of service after February 17, 2009.

Analog cable subscribers comprise approximately 50% of cable subscribers. We do not believe that cable carriers should be allowed to simply cut off signals to the public. Doing so could potentially be detrimental to public safety. We believe that this Proposal facilitates the digital transition in a consumer-friendly manner.

Additionally, we do not think that consumers should be forced to assume the cost of digital converter equipment, through rental or purchase, in order to have access to their local stations.

Adoption of this order will also ensure that digital television signals will not suffer material degradation when carried on cable systems. We support the FCC implementing subjective measures to safeguard against material degradation of High Definition Digital Transmissions.

We urge the Commission to enact a streamlined complaint process to address signal degradation complaints by broadcasters. Such a process will reduce administrative burdens on the Commission, and will help assure that the public's access to the highest quality broadcast programming is maintained.

It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission.

Sincerely,

Louis S. Wall  
President  
SagamoreHill Broadcasting  
211 Pleasant Home Road  
Building D, Suite 3

Augusta, GA 30907

706-922-5644

[Louis@shbtv.com](mailto:Louis@shbtv.com)



Lima Communications Corp.  
1424 Rice Avenue  
Lima, Ohio 45805  
419-228-8835  
www.wlio.com

P. O. Box 1689  
Lima, Ohio 45802  
FAX 419-229-7091  
NEWS FAX 419-225-6109



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SEP - 7 2007

Federal Communications Commission  
Office of the Secretary

The Honorable Kevin J. Martin, Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

CC: Michael J. Copps, Commissioner  
Jonathan S. Adelstein, Commissioner  
Deborah Taylor Tate, Commissioner  
Robert M. McDowell, Commissioner  
James Jordan, Congressman 4<sup>th</sup> District

Thursday, September 06, 2007

The Digital Television Transformation scheduled for February 17, 2009, is quickly approaching. WLIO Television, a leader in the community of Lima, Ohio, has met the requirements of the FCC to replicate our service area.

Since 1953, WLIO has provided news, weather, sports, education, and public service to viewers in West Central Ohio. Our household ratings during almost 3 hours of daily news, and comments from the public during times of emergency have shown us to be needed by the public for the distribution of information.

During August 2007, WLIO sent 59 Emergency Alerts to the public, which included the communities of Findlay, Bluffton, and Ottawa, Ohio, all stricken by severe storms.

These storms caused so much damage that six Ohio counties were declared federal disaster areas. Of those counties, Allen, Hancock, Putnam, and Wyandot counties are all served by WLIO-DT. We also have partial viewership in Crawford County. WLIO performed extensive news coverage of the events, broadcasting from the communities. As of the writing of this letter, we are still informing the public with news reports from civic leaders, and federal officials.

Nearly ten years ago, ex-FCC Chairman Kennard wrote a "Report to Congress" about the power of local television. His conclusions at the end of the report speaks of the public service and community needs that local television serves. Since that time nothing has changed. Local TV is still a high priority to the public.

My nearly 40 year background in broadcasting is technical in nature, so I do not fear changing to digital. I am also the area's EAS co-chairman, and a Communications Deputy for the Allen County Office of Homeland Security. I know firsthand the need of local television to communities in times of emergency. I also know that the public depends on television as their primary source for local news.

Would not it be a shame if in the transition to digital local television is crippled by an inability to deliver a signal to the public? What would be the reaction of the public if they lost access to signals that they have always had access to?

Conversations with my neighbors and the general public have me very concerned. I fear that as the digital transition occurs many citizens of the United States will be left out in the cold without any access to local news plus information, and emergency information distributed through the E.A.S.

Cable television is preferred by viewers in our area. Satellite services do nothing for local news and emergencies. In some areas the public is prohibited from installing reasonable antennas for reception of "over the air" DTV broadcasts due to local covenants, building codes, and NIMBY.

In our community there are very few "real" digital receiver sets. The majority of receivers are analog "legacy" sets, purchased within the past 5 years, with at least 5 to 10 more years of dependable service. Many of these sets are owned by low income, as well as senior citizens who do not have the money nor the knowledge to change to 8VSB digital receivers.

The F.C.C. should consider some sort of mandatory carriage of digital signal(s), with the provision that subscribers are provided with the necessary down conversion equipment for their analog sets. This should include all streams transmitted by a station.

This carriage should apply to any digital television station whom has had an analog presence on a cable system in the past five year.

I believe the F.C.C. would do the public a great disservice if it did not mandate cable carriage for any station presently on a cable system.

A handwritten signature in black ink, appearing to read 'Frederick R. Vobbe', with a stylized flourish at the end.

Frederick R. Vobbe  
Chief Engineer, Vice President  
WLIO Television, Lima OH

From: Jon Rand [mailto:Jon.Rand@kayutv.com]  
Sent: Thursday, September 06, 2007 4:05 PM  
To: Kevin Martin  
Cc: Marsha MacBride  
Subject: Cable TV Viewability Proposal

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SEP - 7 2007

Federal Communications Commission  
Office of the Secretary

Chairman Martin-

Not unlike the Y2K phenomenon we all anticipated as we welcomed in the new millennium, there are lots of unanswered questions facing all of us in the television industry as we march toward the analog TV shutoff date in February 2009.

Television broadcasters have spent enormous amounts of capital to prepare our stations to continue to serve the viewing public in a digital world. Every one of us-broadcasters, the Congress, the FCC, and the cable MSO'S will have short-changed those viewers if we don't take advantage of every means at our disposal to ensure a seamless transition.

I urge your support of the Cable TV Viewability Proposal as the key to seeing that analog cable subscribers are not left out in the cold in February 2009. Further, the purpose of our having undertaken the tremendous expense of providing HDTV signals is lost if those signals are not protected from material degradation.

We ask your support on these issues in the approaching September 11th FCC Open Meeting.

Respectfully,

Jon Rand  
General Manager  
KAYU Fox 28 TV, Spokane/Coeur d'Alene  
KCYU Fox 41 TV, Yakima/Ellensburg  
KFFX Fox 11 TV, Pasco/Richland/Kennewick/Pendleton  
P (509) 448-2828  
F (509) 448-1223

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SEP - 7 2007

Federal Communications Commission  
Office of the Secretary

From: Jeffrey S Bartlett [mailto:jbartlett@hearst.com]  
Sent: Thursday, September 06, 2007 4:24 PM  
To: Kevin Martin  
Subject: Cable TV Viewability Proposal for FCC Consideration

(Embedded image moved to file: pic06922.pcx)

September 6, 2007

The Honorable Kevin J. Martin  
Federal Communications Commission  
445 12 Street, SW  
Washington, DC 20554

Dear Chairman Martin,

I am writing to express my support for the Cable TV Viewability Proposal the FCC will consider at the September 11th meeting. This proposal will protect analog cable subscribers from loss of service after the DTV transition in 2009. It will also ensure our HDTV signals will not suffer material degradation which would in fact rob cable customers of the benefits of the transition ordered by the government and which broadcasters have spent millions to achieve. As the only network affiliate in New Hampshire and the only station in the state providing regular local newscasts, emergency news coverage and local sports programming, we feel it is important that our signal be viewable in the highest quality form available.

Best Regards,  
(Embedded image moved to file: pic10635.pcx)  
Jeff Bartlett  
President and General Manager

(Embedded image moved to file: pic01643.pcx)

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**From:** Ramos, Leopoldo [mailto:LRamos@kren.com]  
**Sent:** Thursday, September 06, 2007 4:40 PM  
**To:** Kevin Martin  
**Cc:** Pappas, Peter  
**Subject:**

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SEP - 7 2007

Federal Communications Commission  
Office of the Secretary

Dear Chairman Martin:

I am the General Manager of Pappas Telecasting's Station KREN/KAZR, the CW affiliate in Reno, Nevada. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

**Leo Ramos**  
General Manager KREN/KAZR  
Phone: 775-333-2727  
Fax: 775-284-1800  
Reno's CW





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SEP - 7 2007

**From:** Joan Turner-Doyle [mailto:[joanturner@kgwn.tv](mailto:joanturner@kgwn.tv)]

**Sent:** Thursday, September 06, 2007 4:47 PM

**To:** Kevin Martin

**Cc:** Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell; [mmacbride@nab.org](mailto:mmacbride@nab.org); [cwilkins@nab.org](mailto:cwilkins@nab.org); Eileen Clark; Louis Wall

**Subject:** Cable TV Viewability Proposal

*Federal Communications Commission  
Office of the Secretary*

Honorable Chairman Martin & Commissioners,

We are very quickly moving towards the digital transition and February 17, 2009 is right around the corner. Many local television stations including CBS NewsChannel 5 in Cheyenne, are launching educational efforts aimed at viewers and forming partnerships with local digital television dealers in an effort to make this an exciting transition for everyone.

I am asking for your support of the Cable TV Viewability Proposal. There must be a way to guarantee that analog cable subscribers will not be disenfranchised after February 17, 2009. There is a great deal of education that needs to be done in a very short period of time. Television signals must be protected from material degradation so that all consumers can gain the full benefits of HDTV.

It is imperative that in the Cheyenne, Wyoming DMA, market 196, with a cable penetration of over 67%, cable operators implement one of the two options offered in the proposal for our must carry signal.

It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission. Thank you,

Respectfully,

Joan Turner-Doyle  
V.P. & General Manager  
KGWN/Cheyenne, Northern Colorado  
KSTF/ Scottsbluff, Nebraska  
KCHW/The Cheyenne CW  
(307) 634-7755 office  
(307) 635-8354 direct fax  
[joanturner@kgwn.tv](mailto:joanturner@kgwn.tv)



1011 Western Avenue, Suite 920  
Seattle, WA 98104

September 6, 2007

Attn: Chairman: Kevin J Martin

As President and CEO of a broadcasting company serving local markets I'm writing to extend my support of the Cable TV Viewability Proposal. This is an extremely important issue, and we need to guarantee that the analog cable subscribers will not be disenfranchised after the DTV transition. We also must protect the TV signals from material degradation so that consumers can reap the full benefits of HDTV.

On behalf of consumers, please support the CableTV Viewability Proposal. It is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition

Pete Benedetti  
President/CEO  
New Northwest Broadcasters  
(206) 204-0213 x201  
[www.nnbradio.com](http://www.nnbradio.com)

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Federal Communications Commission  
Office of the Secretary



**Bruce Cummings**  
**General Manager**  
**KULR Television**

*bcummings@kulr.com*

**kulr8.com**

**FILED/ACCEPTED**

**SEP - 7 2007**

Federal Communications Commission  
Office of the Secretary

September 5, 2007

Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Dear FCC Commissioners:

After reading the Cable TV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Bruce Cummings  
General Manager KULR-8

bc/dlh

c:     The Honorable Kevin J. Martin, Chairman (via email)  
        The Honorable Michael J. Copps, Commissioner (via email)  
        The Honorable Jonathan S. Adelstein, Commissioner (via email)  
        The Honorable Deborah Taylor Tate, Commissioner (via email)  
        The Honorable Robert M. McDowell, Commissioner (via email)  
        Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB (via email)

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SEP - 7 2007

Federal Communications Commission  
Office of the Secretary

From: Frank Bulk [mailto:fbulk@mypremieronline.com]

Sent: Thursday, September 06, 2007 7:11 PM

To: Jonathan Adelstein; Michael Copps; Kevin Martin; Robert McDowell; Deborah Tate

Subject: Re: Triple Carriage Issue

Commissioners:

It has come to my attention that the FCC may have plans to vote on what is called the "Triple Carriage" issue. While it is normally in every cable provider's best interest to retransmit local broadcasting stations, it would place an undue burden to require every MVPD to carry more than what they are currently providing.

Requiring carriage would cause undue burden on those systems that have not built out a digital and HD system, and for those that due, use up valuable spectrum.

Rather than put the onus on MVPDs to carry all stations, I would encourage the FCC to maintain carriage to one channel. Then make it optional for operators to carry the other stations, as their customers demand, not any different than any other channel in the market.

I would encourage the FCC to let market forces dictate whether an operator carries more channels than they currently are required to, rather than regulatory or governmental requirements.

If you should require triple carriage, I would simultaneously recommend that operators have the option of negotiating contracts with broadcasters in neighboring DMAs, so that some level of checks and balances can be in place.

Kind regards,

Frank Bulk  
Sioux Center, Iowa  
712-722-428

**From:** denniswallace@gotricounty.com [mailto:denniswallace@gotricounty.com]

**Sent:** Friday, September 07, 2007 8:58 AM

**To:** Kevin Martin

**Subject:** Triple DTV Carriage

**FILED/ACCEPTED**

**SEP - 7 2007**

Federal Communications Commission  
Office of the Secretary

September 7, 2007

To the Members of the United States Senate

To the Members of the United States House of Representatives

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of

the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Dennis M. Wallace, Jr.  
CEO  
TriCounty Telecom

**From:** Steve Friedman [mailto:stevef@wavebroadband.com]  
**Sent:** Friday, September 07, 2007 9:58 AM  
**To:** Kevin Martin  
**Subject:** Proposed Triple Carriage Must-Carry Order

September 7, 2007

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**FILED/ACCEPTED**

**SEP - 7 2007**

*Federal Communications Commission  
Office of the Secretary*

Dear Chairman Martin:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Steve C. Friedman  
Wave Broadband  
401 Kirkland ParkPlace  
Suite 500  
Kirkland, WA 98033  
(425)896-1882  
sfriedman@wavebroadband.com





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SEP - 7 2007

Federal Communications Commission  
Office of the Secretary

September 5, 2007

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Commissioner Martin:

It is my understanding that the Federal Communications commission has prepared a proposal for Cable TV Viewability which will be under consideration in your September 11, 2007 meeting. As a local broadcaster, I urge you to closely review and support this FCC proposal due to its importance for the American consumer – who are viewers of our local television stations in Northern Michigan..

The proposal gives cable operators two options in delivering both the analog and digital signal of our station; or the digital only signal, but ensuring that their system subscribers have the necessary down conversion equipment on their analog set to receive our local signals. This proposal will protect analog cable subscribers from loss of service after the February 17, 2009 DTV deadline, as well as ensure that local digital television signals will not suffer material degradation when carried on our local cable systems.

This proposal is the only way to guarantee that analog cable subscribers will receive the full benefit of the new HDTV signals from local broadcasters. Your support in this matter is greatly appreciated.

Most Sincerely,

Julie A. Brinks  
VP/General Manager  
WPBN-TV 7 WPBN-DT Traverse City, MI  
WTOM-TV 4 WTOM-DT Cheboygan, MI

**WPBN / WTOM - TV**

P.O. Box 546 • Traverse City, MI 49685 • (231) 947-7770 • Fax (231) 947-1229



CBS Affiliate  
KWCH DT 12

SUNFLOWER BROADCASTING, INC.

September 5, 2007

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**FILED/ACCEPTED**

**SEP - 7 2007**

Federal Communications Commission  
Office of the Secretary

Dear Chairman Martin:

I am writing in support of the Cable TV Viewability proposal that will be before your Commission meeting on September 11, 2007.

I am strongly in favor of this proposal to protect the digital television transition and assure that both analog and digital subscribers are able to receive our best signal after February 17, 2009. The transition from analog to digital is going to be a monumental undertaking for a large number of television viewers, some of whom rely solely on their television for news and entertainment in remote locations in Kansas and will be at a loss to understand what is going on if their television sets simply go black and they haven't any idea what is happening or why.

Approval of this proposal is the only way to guarantee that analog cable subscribers will not be disenfranchised after DTV transition. It will protect analog cable subscribers from loss of service after February 17, 2009 and would also ensure that DTV signals will not suffer material degradation when carried on cable systems.

I respectfully ask for your vote in favor of the Cable TV Viewability Proposal.

Sincerely,

Joan M. Barrett  
President & General Manager  
Sunflower Broadcasting, Inc.  
KWCH-TV/KBSD-TV/KBSH-TV/KBSL-TV/KSCW-TV



LED/ACCEPTED

www.kcwi23.com

SEP - 7 11 07

Federal Communications Commission  
Office of the Secretary

ted stephens  
general manager

(515) 289-4342

Ccell: (515) 249-4700

tstephens@kcwi23.com

Dear Chairman Martin:

I am the General Manager of Pappas Telecasting's Stations KCWI-TV and KDMI-DTV, the CW and MyNetwork affiliates in Des Moines, Iowa. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) down converting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,  
Ted Stephens  
VP/General Manager  
KCWI-TV/KDMI-DTV

**From:** Lawson Fox [mailto:LFox@KTVN.com]  
**Sent:** Wednesday, September 05, 2007 4:54 PM  
**To:** Kevin Martin  
**Subject:** Cable TV Viewability Proposal

To The Honorable Kevin J. Martin:

I am writing you today to let you know that I support the Cable TV Viewability Proposal that assures carriage of must carry broadcast stations' signals in both the analog and their original digital formats. This proposal is important to a smooth and successful transition from analog to digital broadcast television.

Thank you for championing this proposal.

Lawson Fox  
General Manager  
KTVN  
4925 Energy Way  
Reno, NV 89502  
775-858-2222

**From:** Todd and Deb Sulsberger [mailto:mjcatl@netins.net]  
**Sent:** Wednesday, September 05, 2007 5:00 PM  
**To:** Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Robert McDowell  
**Subject:** Oppose DTV Triple Carriage

September 4, 2007

To the Members of the United States Senate

To the Members of the United States House of Representatives

**FILED/ACCEPTED**  
**SEP - 7 2007**  
Federal Communications Commission  
Office of the Secretary

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

◇

Deborah C. Sulsberger  
2595 Old Hwy 141  
Hornick, IA 51026  
member board of directors  
Western Iowa Telephone Cooperative

From: Bram Watkins [mailto:bwatkins@kdbc.com]  
Sent: Wednesday, September 05, 2007 5:43 PM  
To: Kevin Martin  
Subject: DTV Carriage "Viewability" Rules

FILED/ACCEPTED  
SEP - 7 2007  
Federal Communications Commission  
Office of the Secretary

Dear Chairman Martin,

I am the General Manager of Pappas Telecasting's Station KDBC TV, the CBS affiliate in El Paso, Texas.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch

to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal

to require cable operators to choose between (a) downconverting the digital must-carry channels and

carrying both the digital and analog signals for these channels and (b) carrying the local must-carry

signals in digital only and providing the necessary equipment to ensure that all subscribers can view those

signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the

DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules

to digital carriage, and believe that the Commission's proposal in this regard will ensure that

every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Bram Watkins  
General Manager  
KDBC TV 4 El Paso  
2201 Wyoming Ave.  
El Paso, Texas 79903  
Office: 915.496.4400  
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**From:** Tom Tolar [mailto:ttolar@wrcbtv.com]  
**Sent:** Wednesday, September 05, 2007 5:49 PM  
**To:** Kevin Martin  
**Subject:** Cable TV Viewability Proposal

SEP - 7 2007  
Federal Communications Commission  
Office of the Secretary

Dear Chairman Martin,

Thank you for championing the Cable TV Viewability Proposal and scheduling it for consideration at your meeting on September 11<sup>th</sup>. WRCB-TV/DT serves more than 845,000 television households. We have viewers in Tennessee, Georgia, North Carolina and Alabama. Since our viewing area is mountainous, our viewers depend on a mix of over-the-air, cable and satellite services for television reception. It is imperative that the February 17, 2009 transition date not result in a loss of service for the cable subscribers in our area. It is also imperative that they not suffer material degradation of the digital signals (including High Definition telecasts) from their cable systems. Your proposal gives cable operators viable options for dealing with the digital transition; but, it is also the only way to guarantee the ability of our cable viewers to receive digital telecasts from free, over-the-air broadcasters after the transition date without interruption or degradation of signal quality.

Best regards,

Tom Tolar  
President/General Manager  
WRCB-TV  
900 Whitehall Road  
Chattanooga, TN 37405  
ttolar@wrcbtv.com

*This email may be considered an advertising or promotional message.*

If you do not wish to receive further emails from WRCB TV/ST Productions that contain an advertising or solicitation message, please send an email to [opt-out@wrcbtv.com](mailto:opt-out@wrcbtv.com). You must use this method to notify WRCB TV/ST Productions of your opt-out request, as we cannot guarantee that other methods of notification will be effective. Please be aware that we may continue to contact you via email for administrative or informational purposes, including follow-up messages regarding contests you have entered or other transactions you have undertaken. By law, such messages are not considered to be commercial email.





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Federal Communications Commission  
Office of the Secretary

September 4, 2007

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107 N. 4th Street - P.O. Box 66 800-642-6201  
Clear Lake, IA 50428-0066 fax: 641-357-8800

To the Members of the United States Senate  
To the Members of the United States House of Representatives

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Thomas A. Lovell  
Gen Manager  
Clear Lake Independent Telephone Company